

EAST HORSLEY PARISH COUNCIL

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13 June 2016

Planning Policy,
Guildford Borough Council,
Millmead House,
Millmead,
Guildford,
Surrey
GU2 4BB

Dear Sirs,

Comments on Proposed Submission Local Plan

East Horsley Parish Council (“EHPC”) has carefully considered the Proposed Submission Local Plan which Guildford Borough Council (“GBC”) has now published for public consultation. Our comments are set out in this letter.

EHPC has strong concerns about the Proposed Submission Local Plan and the evidence and assumptions which support it. In particular, EHPC does not agree with the scale of the house building programme which is being proposed by GBC. The target outlined represents a 25% increase in the housing stock of the borough, whilst we note that the Office of National Statistics (“ONS”) projects a population increase of some 15% for Guildford Borough over this same period.

EHPC also notes that the Proposed Submission Local Plan includes the statement “*We will continue to protect the Metropolitan Green Belt*”. We fully and un-equivocally support this policy. However, unfortunately GBC appears to be in breach of this same policy through the housing policies it has set out in the Proposed Submission Local Plan, whereby some 65% of developments will be made on land that is currently Green Belt.

EHPC is also concerned that the infrastructure proposals are inadequate even to meet the needs of what is there at the moment, let alone the proposed developments in the Local Plan.

EHPC therefore OBJECTS to the Proposed Submission Local Plan.

Detailed comments on the six different policy areas which form the basis of the Proposed Submission Local Plan are now set out below, followed by our comments on specific site allocation policies.

1. STRATEGIC POLICIES

This section provides comments on the two basic strategic policies which provide the overall framework for the Proposed Submission Local Plan.

Policy S1: Presumption in favour of sustainable development

We support the objective of favouring sustainable development as set out in Policy S1. It is in effect merely repeating what is already NPPF policy.

Policy S2: Borough Wide Strategy

This policy sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum.

EHPC has serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. It is even more remarkable when the official statisticians at the Office of National Statistics (“ONS”) are projecting a population increase of some 15% for Guildford Borough over this same period.

Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DCLG”) are predicting Guildford will require based upon their population and household forecasts. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

EHPC finds this analysis perplexing. Economic growth is already factored into the statistics produced by ONS and DCLG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough. Moreover, the GBC Affordable Housing Policy H2 is proposing that all development sites (other than the very smallest) will be required to have 40% of their homes offered as affordable housing, so why another 31 homes per annum is needed as affordable housing on top of this 40% ratio is quite incomprehensible.

Furthermore, DCLG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, the outcome will be that Guildford Borough would see its population rise by around 25% over this period. This means that the resultant population growth for Guildford Borough would be at a level 67% higher than the official forecasts.

One of EHPC’s particular concerns in reviewing the Proposed Submission Local Plan is that the impression is conveyed upon the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements or because of central government policy – in other words that GBC has no real choice but to put forward these projections, unpalatable though they might be. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of aggressive civic and economic expansion – one might perhaps term it a policy of ‘Forced Growth’ – which underpins all of the housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a political choice made by GBC.

Of course, there is nothing fundamentally wrong in GBC adopting a Forced Growth policy for the Borough – not so long as that policy is made clearly and explicitly and is fully supported by a majority of its electorate. However, EHPC doubts whether this is actually the case. It is certainly not a vision that is shared by EHPC, which unequivocally rejects GBC’s Forced Growth policy.

EHPC accordingly OBJECTS to the borough housing targets set out in Policy S2.

2. HOUSING POLICIES

This section provides comments on the housing policies set out in the Proposed Submission Local Plan.

POLICY H1: Homes for all

We support the general policy statements made in this policy, which are mostly repeating NPPF policies. Our main concerns, as set out previously, are primarily with the scale of new housing being proposed.

POLICY H2: Affordable Homes

We support the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term.

In this policy GBC have taken no regard whatsoever of the differences in affordable housing need across the borough. This has significant consequences in East Horsley, which is the area with the lowest demand for affordable housing in the borough. Moreover, East Horsley is not classified as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the new ‘right to acquire or enfranchise’ entitlement – a factor which is likely to see affordable houses in the parish being bought up as soon as possible and thereafter lost to the affordable sector.

Under Policy H2, 40% of all but the smallest development sites in East Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more social housing in that area. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for larger 3-bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a rapid buying-up of properties for quick re-sale at a generous profit, at which point these homes also become lost to the affordable sector.

EHPC accordingly OBJECTS to Policy H2.

POLICY H3: Rural exception homes

We support this policy.

3. PROTECTING POLICIES

This section in the Proposed Submission Local Plan sets out policies concerned with protecting the environment across Guildford Borough, including the Metropolitan Green Belt.

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty ('AONB')

The Surrey Hills AONB is one of the great treasures of Guildford Borough and we believe that protecting this area should be given the highest priority.

We therefore support Policy P1.

POLICY P2: Green Belt

Local Plan Policy P2 states that: *We will continue to protect the Metropolitan Green Belt.* We fully and un-equivocally support this policy.

Unfortunately, despite such brave words, GBC appears to be in breach of this policy itself through the housing policies that it has set out in the Local Plan. The analysis included in the Appendix shows that around 65% of the developments proposed in the Proposed Submission Local Plan are to be built on land currently within the Metropolitan Green Belt. We consider this outcome to be outrageous.

Under NPPF rules, GBC is permitted to make allowance for factors which may constrain the delivery of new housing, such as the need to protect the Metropolitan Green Belt or the restrictions required to protect the Surrey Hills Area of Outstanding Natural Beauty ('AONB') which is offered protection under the NPPF comparable to that of a national park. Although these areas make up a large proportion of the land area of Guildford Borough, GBC makes no attempt to reduce its housing delivery in order to take account of such constraints. We find this approach inexplicable.

There are also a number of further issues relating to the detailed implementation of this policy which are set out further below:

a) Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt

Policy P2 proposes that East Horsley should be inset from the Green Belt, instead of being 'washed over' as it is today. Currently development is permitted within the settlement boundary, although this area is still considered to be Green Belt with a particular planning regime being applicable.

East Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being 'washed over' by the Green Belt has not been a serious constraint on development within the village. For example, GBC's planning records indicate that no less than 149 net new homes were added to the village housing stock through in-filling and brownfield developments between 2000 and 2015.

GBC attributes the need to inset East Horsley to NPPF requirements, arguing that the test for remaining 'washed over' is that the village should make an important contribution to the openness of the Green Belt. This East Horsley clearly does. No less than 36% of East Horsley is composed of woodlands, whilst inside the settlement area there is an average housing density of just 8.1 dwellings per hectare ('dph'). Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the greenbelt. It is one thing for a planner to study a map and see a settlement area filled with housing, but it is quite another actually to come to a rural village like East Horsley and see how the Green Belt has preserved the rural character and openness of this village.

Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience steady incremental growth as a result of being 'washed over' by the Green Belt. As the saying goes: "*If it ain't broke, don't fix it*". This applies to East Horsley in the matter of inseting.

EHPC therefore OBJECTS to the proposal to inset East Horsley from the Green Belt and requests that this proposal be dropped from the Local Plan.

b) Paragraph 4.3.16 and Proposals Map: Settlement Boundary changes in East Horsley

GBC are proposing to make a number of changes to the settlement boundaries of East Horsley and so expand the settlement area, as set out in the Proposals Map, with the justifications seemingly provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

We object to two specific boundary changes, which have been proposed, as follows:

- i) There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a 'main river line' and therefore represents a highly defensible Green Belt boundary.

Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. We do not believe this proposal can be considered as an exceptional circumstance. Clearly the only justification for this change is to bring a large agricultural field within the settlement area in order to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary. As such, we believe it is an invalid proposal.

EHPC accordingly OBJECTS to this proposed boundary change.

- ii) There is also a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt.

Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present settlement boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in 'exceptional circumstances'. We do not believe that this can be considered as an exceptional circumstance. As such we believe this is an invalid proposal.

EHPC accordingly OBJECTS to this proposed boundary change.

In the Green Belt & Countryside Study and its accompanying Topic Paper, GBC justifies the need to make changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. However, Green Belt rules make it clear that unfulfilled housing need is not normally considered to be 'an exceptional circumstance'. If it were the entire Green Belt would already be covered in tarmac.

The NPPF is clear that every movement in settlement boundaries must be justified by 'exceptional circumstances'. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need, but a case by case justification has not been provided. As such, we believe

the settlement boundary changes referred to above (and many others) are invalid without such detailed justification.

c) Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt

EHPC OBJECTS to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below in the Site Allocation section.

d) POLICY P2: Limited In-filling

A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. Within this area, Policy P2 sets out proposals that would allow ‘limited in-filling’ within this boundary.

We find it hard to reconcile the opening statement of Policy P2 that “*We will continue to protect the Metropolitan Green Belt*” with this sizeable reduction in effective Green Belt status. In our opinion, this policy represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt, whose effectiveness is significantly weakened where this new planning designation applies.

EHPC accordingly OBJECTS to the proposal to designate roads south of the A246 as being within the ‘identified boundary of the village’ and to allow limited infilling within this area.

POLICY P3: Countryside

We have no objections to this policy.

POLICY P4: Flooding...

We support this policy.

POLICY P5: Thames Basin Heath Special Protection Areas

We support this policy.

4. ECONOMY POLICIES

POLICY E1: Sustainable employment

We support the general policy statements made in this policy, whilst having no opinion on the scale of the new office space and industrial land area being proposed by GBC.

POLICY E2: Location for new employment floorspace

Under this policy, areas within 500 meters of a "public transport interchange" play a key role.

Proposals for new office and research and development floorspace are to be directed to firstly Guildford town centre and then to areas within 500 meters of a public transport interchange ("PTI").

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the draft Local Plan only proposes that Horsley Station should have PTI status.

The explanation given at 4.4.17 for Effingham Junction Station ("EJS") not enjoying this status is that either it is located within the Green Belt, or it is within an AONB or it is isolated away from the village or centre. It is not clear which of these applies to this particular station, but we believe strongly that none apply and that there is a strong case for EJS deserving PTI status in the same way as Horsley Station.

We will deal firstly with the three alternative reasons given for EJS not supposedly qualifying as a PTI.

Firstly there is the Green Belt aspect. This is not logical since if location within the Green Belt were determinative, this would mean that Horsley Station would also fail to gain PTI status.

Also the draft Local Plan proposes elsewhere at Policy P2 that the whole of East Horsley, including both Horsley Station and EJS, should be inset from the Green Belt. It will be seen elsewhere in these comments that EHPC objects strongly to this proposal, but the point remains that if location within the Green Belt were a valid reason for not being given PTI status, the Local Plan itself makes it clear that under Policy P2 this will not apply in the case of both Horsley Station and EJS..

Secondly EJS is not located in an AONB. EJS is within the envelope of the village settlement and will remain as such under the draft Local Plan.

Thirdly EJS is not "isolated" or "away from the village centre."

Effingham Junction (the area immediately south and west of EJS, served by respectively Forest Road south of the railway bridge and Old Lane) may not have the extensive shopping parades enjoyed by East Horsley's two other centres (Station Parade and Bishopsmead Parade) but it is a thriving community with a significant population and also a significant number of active and successful employment floorspaces and sites.

These include in Forest Road a general store (Forest Road General Store), a car sales and car repair business (PJB Car Sales/The Body Shop), a dental health centre and chiropractic clinic (Mortiboys) and on Horsley Road, Cedar Garden Centre, Royce Turf and Irrigation and at the Newmarsh Farm site, a number of businesses including Richmonds Horse Transport, Braye Hydraulic Repairs and TTS Surfacing Ltd.

It is therefore vital that the Local Plan's economy policies affecting the area protect these spaces and sites and create conditions for their sustainable growth and hence job creation.

Since all or most of these businesses are located within 500 meters of EJS, Policy E2 would be an invaluable driver for such growth which could play a major role in ensuring that Effingham Junction maintained and enhanced its position as East Horsley's "third centre" for homes and jobs. On the other

hand, to exclude EJS from PTI status could very well stifle its sustainable development and condemn it to a future as a dormitory "backwater" of East Horsley.

It is also counter-intuitive in the extreme to refuse EJS "PTI" status. This is for the simple reason that EJS is clearly a "public transport interchange" as that term would be normally understood. This is for the following reasons:

- 1 as the name "Effingham Junction" indicates, EJS is at an important junction and interchange. The railway line from Guildford splits here into two lines which take different routes into London, so many London-bound passengers will change trains here;
- 2 EJS serves not only the Effingham Junction area, but also the many residents of Effingham and Little Bookham for whom EJS is far closer than Bookham Station;
- 3 EJS also serves the many residents of the Cobham area for whom EJS is far closer than Cobham and Stoke d'Abernon station EJS also serves the residents of Ockham and Ripley;
- 4 EJS also serves the considerable numbers who visit local leisure activity sites, including three paintball sites and two clay pigeon shooting sites, for whom EJS is the only viable public transport hub; and
- 5 EJS will be the nearest railway station to the land at the former Wisley Airfield site which is proposed for the building of 2000 homes under Policy A35 of the draft Local Plan and if, despite the objections of many including East Horsley Parish Council, this proceeds, then significant numbers of residents will be taking one form of travel to EJS and then interchanging onto the railway.

EHPC accordingly OBJECTS to Policy E2 insofar as it fails to confer "public transport interchange" status on Effingham Junction Station.

POLICIES E3 to E7:

We have no comments on these policies.

POLICY E8: District centres

We support this policy, including the designation of Station Parade, East Horsley, as a District Centre under the draft Local Plan.

POLICY E9: Local centres

We support this policy, including the designation of Bishopsmead Parade, East Horsley, as a rural Local Centre under the draft Local Plan.

5. DESIGN POLICIES

This section sets out the basis for a number of design policies relating to proposed developments in the Borough.

POLICY D1: Making better places

We support this policy.

POLICY D2: Sustainable design, construction & energy

We support this policy.

POLICY D3: Historic environment

East Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. We fully support this policy.

POLICY D4: Development in urban areas and inset villages

We support this design policy, although not the proposal of Policy P2 to inset East Horsley from the Green Belt.

6. INFRASTRUCTURE POLICIES

This section of the Proposed Submission Local Plan sets out details covering a range of infrastructure policies.

POLICIES 11, 12 & 13

These three policies cover Infrastructure & Delivery, Supporting the Department of Transport's 'Road Investment Strategy' and Sustainable Transport. Whilst we support the general policy statements as presented in each case, it is the detailed infrastructure proposals for Guildford Borough which give us cause for concern.

EHPC believes there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today and that the aggressive housing policy as proposed by GBC in the Proposed Submission Local Plan will exacerbate this problem.

We would make the following comments specifically about infrastructure in East Horsley today:

- Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic;
- The principal through roads traversing East Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: "*East Horsley has lanes, not roads.*" East Horsley's 'lanes' are totally unsuitable for high volumes of traffic, in particular for the volume of HGV's now using them;
- Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water flooding when it rains;
- The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or in wheelchairs;
- There are insufficient school spaces for the number of local children needing them, with the result that children are often allocated to schools a significant distance away such as Dorking or Woking; and
- The Medical Centre in East Horsley is already at capacity in terms of its number of patients.

It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council or utility companies.

In respect of East Horsley, there are only two specific proposals in Appendix C:

LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it

is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.

There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools.

Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, will put further strain on the existing infrastructure. There are no proposals at all to cater for this.

Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, EHPC believes that this needs to be done earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for East and West Horsley, which taken together would result in the building of 593 new houses in the two parishes that are today served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggest that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Local Plan to provide for any more schooling in the Horsley's.

EHPC believes that the failure to address the inadequacies of the existing infrastructure to meet the needs of what is there already is a serious deficiency in the Proposed Submission Local Plan.

EHPC accordingly OBJECTS to the infrastructure proposals on these grounds. It further OBJECTS to the proposals for infrastructure in that they do not meet the stated objective of providing infrastructure to support the proposed developments.

POLICY I4 Green and blue infrastructure

We support this policy.

7. SITES POLICIES

Of the many sites policies set out in the Proposed Submission Local Plan, we comment upon those in East Horsley as well as several in the surrounding area which may affect the village.

Five East Horsley sites are identified in GBC's Land Availability Assessment ('LAA'), two of which are allocated under policies in the Proposed Submission Local Plan. The adjacent parish of West Horsley has six sites identified in the LAA, four of which are allocated in the Proposed Submission Local Plan. Our comments on these site policies are as follows:

POLICY A36: Hotel, Guildford Road

Policy A36 proposes to re-develop the current Thatcher's Hotel for housing.

EHPC is concerned about the loss of this long-standing village hotel and significant employer. However, assuming that the employment loss can be justified, (which is a condition of Policy A36), then EHPC is broadly supportive of housing development at this location, providing it is done in a manner that is in keeping with its prominent landmark position at the entrance to the village. The site is also close to the East Horsley Conservation Area and housing designs and site configuration must reflect the sensitivity of this setting.

Whilst we endorse many of the requirements set out in Policy A36, our principal concern is over the number of houses proposed for this site - approximately 48 dwellings. This number gives an implied gross housing density of 37 dwellings per hectare, which is exceptionally high for this location. The average housing density across the East Horsley Settlement Area is 8.1 dwellings per hectare and the highest density found in any of the roads around this location is 13 dwellings per hectare.

EHPC would only support development at this location if it has a significantly lower housing density.

POLICY A39: Land behind Ockham Road North, near Horsley railway station

Policy A39 proposes a housing development of some 100 dwellings on a 5.7 acre green-field Green Belt site behind the houses on the western side of Ockham Road North. Access is to be secured by demolishing the first two houses next to the railway bridge.

As discussed earlier, EHPC considers that the proposed western movement of the settlement boundary needed to bring this site within the settlement area is unjustified and contrary to NPPF rules. If this boundary movement is invalid, as we believe, then this site remains a part of the Metropolitan Green Belt. As such and with no 'very special circumstances' to justify housing development upon it, EHPC OBJECTS to Policy A39.

POLICIES A37, A38, A40 & A41, located in West Horsley

The LAA identifies six sites in West Horsley for potential development, the four largest having allocation policies within the Proposed Submission Local Plan. The total housing number arising from these six sites is 405 homes in total. For a village which had 1,124 dwellings at the 2011 Census, this represents a proportional increase of 36% over the plan period, an enormously high proportion by any standards.

The four policy sites are all located within the Green Belt. One is a partly brownfield development but the other three sites are all open fields used for agriculture and all lie within the current Green Belt at the edge of the Settlement Area. The reasons presented by the consultants, Pegasus, in the Green Belt & Countryside Study to justify these settlement boundary movements appear to us highly questionable and in no way to meet the requirements of the NPPF that such boundary movements are

only to be made in 'exceptional circumstances'. These movements clearly represent a deliberate pushing back of settlement boundaries in order to provide more greenfield sites for housing development. As such, we consider these proposed movements in settlement boundaries to be invalid.

These proposals are also contrary to the principles of the Metropolitan Green belt. West Horsley represents one of the first 'lines of defence' against London urban encroachment outside of the M25 circle. Yet these policies will eliminate a significant part of this defence as they seek to expand the boundaries of this village and fill-in every bit of green space within this rural setting.

It is also totally contrary to the opening statement of Local Plan Policy P2 that "*We will continue to protect the Metropolitan Green Belt*" It seems that in West and East Horsley at least the draft Local Plan is doing exactly the opposite.

Given the scale of the development proposed in West Horsley, the inevitable destruction of its village character and the impact on infrastructure across West and East Horsley, EHPC OBJECTS to the site allocation policies A37, A38, A40 and A41.

POLICY A35: Land at former Wisley Airfield

Policy A35 proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

EHPC has major concerns about this proposed development and has objected against prior planning applications at this location. We consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability which will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will cause irreversible destruction to the character of one of the most picturesque and historic areas of the country.

EHPC strongly OBJECTS to Policy A35 and will provide a more detailed submission outlining our arguments against this policy in a separate letter.

Concluding remarks

EHPC does not share the same vision for the future of Guildford Borough as GBC, although we do recognise that an enormous volume of work has gone into the preparation of the Proposed Submission Local Plan, which is now out for public consultation.

However, after more than 20,000 responses were submitted in 2014 in connection with the previous draft Local Plan, most of them opposed to its proposals, GBC has made relatively few changes from the earlier version and none of any materiality.

At the heart of the problem is GBC's desire to pursue a 'Forced Growth' policy which results in highly aggressive and unjustified targets being set for housing development in the Borough. These excessive targets – the proposed 25% increase in housing stock in particular – create a tremendous strain on both land and infrastructure in an already over-crowded and over-stretched part of the country.

These targets will also have a material adverse impact on the Metropolitan Green Belt across this area, despite all the political promises made to the contrary. The irony of Policy P2 which states that "*We will continue to protect the Metropolitan Green Belt*" does not fool anybody.

Accordingly EHPC OBJECTS to the Proposed Submission Local Plan.

We sincerely request that GBC that radically re-assess its own policy objectives rather than force through the Council a Local Plan which clearly does not have the wider support of the residents of Guildford Borough.

We reserve the right to make further submissions during the course of this consultation.

Yours faithfully,

N.S. Clemens

Mr Nicholas Clemens,
Clerk & Responsible Financial Officer,
East Horsley Parish Council

APPENDIX

The following table sets out an analysis of new housing developments proposed in the draft Local Plan and provides an estimate of the new of developments which are set within the Metropolitan Green Belt:

Planned Delivery between 2018 and 2033 (See Policy S2, page 27)

Settlement	Homes (net increase)	Currently Greenbelt
Guildford Town Centre	1,172	
Guildford urban area (excluding Town Centre, including SARP)	1,570	
Ash and Tongham	91	
Inset villages and infill development within identified Green Belt villages	431	Y
Rural exception housing	90	Y
Previously developed land in the Green Belt	299	Y
Ash and Tongham strategic location of growth	1,241	
Urban extensions to Guildford including Gosden Hill Farm, and Blackwell Farm (Policies A25 and A26)	3,940	Y
Former Wisley airfield (Policy A35)	2,100	Y
Normandy and Flexford village expansion (Policy A46)	1,100	Y
Village extensions (including Ash Green southern site)	993	
Ash Green southern site (Site A27)	58	
Village extensions (excluding Ash Green southern site)	935	Y
Windfall	625	

Totals:	13,652	8,895
Proportions:	100%	65%